

Appl. No. 09/881,788
Docket No. 351913-910800 (Formerly 2102397-910800)
Response to Office Action of July 11, 2005

REMARKS/ARGUMENTS

Claims 1-29 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. 2002/0081559 to *Brown et al.* ("*Brown*"). Applicant respectfully traverses on the ground that *Brown* does not disclose every element of Applicant's claims.

Brown

Brown discloses a content delivery system using a memory card. A memory card 122 is encoded with an identification code and the location of a file server 112 (§ [0015]). The memory card 122 is inserted into a card reader 126, which reads the information and sends it to the file server 112 identified by the card 122 (§ [0029]). The file server 112 locates content corresponding to the identification code, retrieves it from the database 148, and sends it to a multimedia processor 124 and display 128 for showing to the user (§ [0029]).

In light of this, three points should be noted:

1. The memory card 122 is a standard memory card such as a credit card, that uses a magnetic information strip (§ [0015]). In particular, the memory card 122 does not use a content addressable memory.
2. The memory card 122 of *Brown* is merely a storage device that cannot process information by itself.
3. *Brown* discloses a memory card 122 that only contains stored information, and not instructions.

Appl. No. 09/881,788
Docket No. 351913-910800 (Formerly 2102397-910800)
Response to Office Action of July 11, 2005

Claim 1

As noted in the first point above, *Brown* discloses a memory card 122 that is a standard memory card such as a credit card (§ [0015]). Nowhere does *Brown* disclose, or even suggest, a card having a content addressable memory. As claim 1 recites a content addressable memory, it is patentable for at least this reason.

Claims 10, 22, and 29

As noted in the second point above, the memory cards 122 of *Brown* merely store information like identification and assignment information. Any processing of that information is done by the file server 112 (§ [0029]), multimedia processor 124 (§ [0044]), or remote interface 114 (§ [0048]). The memory card of *Brown* does not process this data in any way – it merely stores it. Accordingly, *Brown* does not disclose every element of claim 10, which recites comparing data “in a memory card wallet . . .” (emphasis added). Similarly, *Brown* does not disclose every element of claim 22, which recites that “the memory card wallet determines that there is a match between the received identifier and a pre-determined identifier . . .” (emphasis added). Likewise, *Brown* does not disclose every element of claim 29, which recites that “the memory card wallet determines that there is match between the first user-selected identifier and a stored entry . . .” (emphasis added).

Claim 28

As noted in the third point above, the memory card 122 of *Brown* only stores data such as identification and assignment information (§ [0029]). Nowhere does *Brown* disclose, or even suggest, memory cards 122 that also store instructions. In fact, as the processing of the stored information is performed by other components besides the memory card 122, the instructions for processing that information must lie elsewhere. Accordingly, *Brown* does not disclose every

Page 9 of 11

PA\10441539.1
351913-910800

Appl. No. 09/881,788
Docket No. 351913-910800 (Formerly 2102397-910800)
Response to Office Action of July 11, 2005

element of claim 28 as amended, which recites a memory card that stores "instructions for determining . . ." and "instructions for providing . . ."

The Dependent Claims

The remaining claims depend from one of claims 1, 10, 22, 28, or 29, and are thus patentable for at least the same reasons as above.

Appl. No. 09/881,788
Docket No. 351913-910800 (Formerly 2102397-910800)
Response to Office Action of July 11, 2005

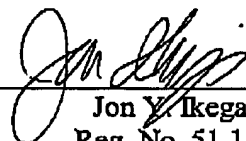
CONCLUSION

For the foregoing reasons, it is respectfully submitted that the claims are in an allowable form, and action to that end is respectfully requested.

Please charge any additional fees, including any fees necessary for extensions of time, or credit any overpayments to **Deposit Account No. 07-1896**, referencing **351913-910800 (Formerly 2102397-910800)**.

Respectfully submitted,
DLA Piper Rudnick Gray Cary US LLP

Dated: January 10, 2006



Jon Y. Ikegami
Reg. No. 51,115
Attorneys for Applicant(s)

Jon Y. Ikegami
DLA Piper Rudnick Gray Cary US LLP
2000 University Avenue
East Palo Alto, CA 94303-2248
650-833-2104 (Direct)
650-833-2000 (Main)
650-833-2001 (Facsimile)
Jon.ikegami@dlapiper.com